

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CYWEE GROUP LTD.,

Plaintiffs,

v.

HTC CORPORATION, and HTC AMERICA,
INC.,

Defendants.

Case No.: 2:17-cv-00932-JLR

**DECLARATION OF KARL STRAATVEIT
IN SUPPORT OF
STMICROELECTRONICS, INC.'S
MOTION TO DISMISS**

HTC CORPORATION, and HTC AMERICA,
INC.,

Third-Party Plaintiffs,

v.

STMICROELECTRONICS N.V.,
STMICROELECTRONICS, INC., and CYWEE
MOTION GROUP LTD.,

Third-Party Defendants.

1
2 1. My name is Karl Straatveit. I am the Senior Accounting Manager of
3 STMicroelectronics, Inc., (“ST Inc.”) a title which I have held for eight years. My responsibilities
4 include oversight of various accounting matters for ST Inc. In total, I have been employed by ST
5 Inc. for 17 years. I have personal knowledge of the facts herein. I am competent to testify to all
6 of the facts herein.

7 2. ST Inc. is the indirect subsidiary of STMicroelectronics N.V., a Dutch
8 holding company headquartered in the Netherlands that is the ultimate parent to more than 60
9 companies around the world. ST Inc.’s affiliates in Europe and Asia are engaged in the design,
10 manufacture and sale of semiconductors for use in a wide variety of commercial and consumer
11 products. ST Inc. does not manufacture any semiconductor products. Rather, ST Inc.’s principal
12 business is the sale of semiconductor products to U.S. customers.

13 3. I understand that HTC Corporation sent a letter to ST Inc. dated October 2,
14 2017, which referenced the purchase order attached as Exhibit A (“Purchase Order”). The
15 Purchase Order is directed to STMicroelectronics Asia Pacific Pte. Ltd. (“ST Asia”) and not ST
16 Inc. The Purchase Order purports to order STM32F411CEY6TR controllers. ST Inc. did not
17 receive, fulfill, or play any role in connection with the Purchase Order. Nor has ST Inc. ever sold
18 or supplied STM32F411CEY6TR controllers to either HTC Corporation or HTC America, Inc.
19 (collectively, “HTC”).

20 4. I further understand that HTC filed a third-party complaint against ST Inc.
21 alleging that ST Inc. sold and supplied “motion sensor devices” to HTC pursuant to a purchase
22 order that requires ST Inc. to defend and indemnify HTC with respect to claims of patent
23 infringement. HTC’s allegations are not true. ST Inc. has never sold or supplied any motion
24 sensor devices to HTC, or agreed to defend or indemnify HTC in connection with claims of patent
25 infringement against any motion sensor devices. There are no purchase orders or contracts
26 between HTC and ST Inc. relating to motion sensor devices.

1 5. I declare under penalty of perjury under the laws of the United States that
2 the foregoing is true and correct.

3
4 Executed this March 26, 2018, at Coppel, Texas.

5
6 /s/ Karl Straatveit
7 Karl Straatveit

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2018, I filed the foregoing with the Clerk of the Court using the CM/ECF system, and served all parties via ECF.

Dated: March 26, 2018

s/ Matt Berkowitz
Matt Berkowitz